

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Bankruptcy No. 20-20774-CMB  
: :  
AARON C. STEVENS : Chapter 7  
: :  
*Debtor* : :

**BKRES AGREEMENT AND DECLARATION OF PATRICK BUTLER**

The undersigned, Patrick Butler (“Declarant”) hereby states:

1. I am employed by BK Global Real Estate Services (“Applicant” or “BKRES”), which is an entity duly licensed as a real estate brokerage by the State of Florida located at 1095 Broken Sound Pkwy NW Suite 100, Boca Raton, FL 33487. I am Applicant’s broker-in-charge and am authorized by Applicant to submit this Declaration on Applicant’s behalf in support of the BKRES Application and in accordance with Bankruptcy Rule 2014.

2. Based upon the information discussed below, I believe that Applicant is a disinterested person and does not hold or represent any interest adverse to the interest of the Debtor’s estate as that term is defined in Section 101(14) of the Bankruptcy Code.

3. To the best of my knowledge: (a) neither BKRES nor any of its employees has any connection with the Debtor, its creditors in this case, the Chapter 7 Trustee, the Office of the United States Trustee, or any employees thereof or any party in interest herein; (b) BKRES and each of its employees are “disinterested persons,” as that term is defined in Section 101(14) of the Bankruptcy Code; and (c) neither BKRES nor any of its employees hold or represent an interest adverse to the Debtor’s estate.

4. That I have read the application of the Trustee regarding the retention and compensation of BKRES and agreed to be bound by the terms and conditions represented therein.

5. That I further understand that the Court, in its discretion, may alter the terms and conditions of employment and compensation to be paid in this matter.

6. In consideration of the foregoing, BKRES will perform one or more services as directed by the Trustee, including but not limited to:

- Researching the real estate, running title and lien searches to identify creditors for resolution and any title issues;
- Advising the trustee of any issues and discuss potential resolutions;
- Conducting the resolutions under the trustee’s direction;
- Assisting the trustee in the collection of documents and information for employment;
- Making contact with the secured creditor(s);
- Notifying them of the upcoming sale and identifying servicer requirements;
- Assisting the trustee in establishing market value and negotiating with the servicer an acceptable sales price and establishing a carve-out;
- Development of online marketing, email campaign and full nationwide marketing services;
- Conducting an online sale;
- Use of the technology platform;

- Assist the trustee in the review of all offers and coordinate the final documentation of the offer accepted by the trustee;
- Managing contract requirements such as inspections, appraisals and HOA applications;
- Coordinating closings and assisting the trustee in the collection of required information for court filing; and
- Closing the transaction and ensure the estate has received the appropriate funds

Verified under penalty of perjury that the foregoing is true and correct.

Dated: June 2, 2020



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